

**FOX, IMES, & CROSBY, LLC**

Troy S. Fox, Esq.

Nevada Bar No. 11127

601 S. 10<sup>th</sup> St. Suite 202

Las Vegas, NV 89101

TFox@FICLegal.com

**DISTRICT COURT**

**CLARK COUNTY, NEVADA**

In re:

Case No. 23-14371-NMC

Leo Harold Santoro,

Chapter: 13

Debtor.

Stephanie Santoro, et al.,

Adv. Case No. 24-01004-NMC

Plaintiff,

vs.

Hearing Date: 08/08/2024

Hearing Time: 9:30 a.m.

Leo Harold Santoro, et al.,

Defendant.

**Declaration of Troy S. Fox in Support of  
Counsel's Motion to  
Withdraw as Counsel**

I, Troy S. Fox, Esq., declare the following:

1. I am an attorney with Fox, Imes, & Crosby, the law firm currently representing the Debtor in above cited Adversary Case.

2. I am familiar with the above titled case, and I have reviewed various notes and spoken with staff and am familiar with the circumstances regarding this case. I have been the lead attorney handling this case since we began to represent Mr. Santoro in late February of 2024.

3. At this point, issues have arisen between Mr. Santoro and the Firm, particularly myself as his primary counsel. The situation is to the point that I no longer believe that I can continue to zealously represent Mr. Santoro in this adversary case. Nor is any other attorney at the firm able or willing to take on this Adversary matter at this time.

5. The Debtor and Counsel have reached a point where the attorney-client relationship has become unsustainable, and Counsel believes it is necessary to withdraw at this time.

7. Mr. Santoro has counsel representing him in the underlying bankruptcy case, who is handling the Chapter 13 confirmation process and related matters. The withdrawal of Fox, Imes, & Crosby does not impact the underlying bankruptcy case.

**I declare under penalty of perjury the forgoing is true and correct.**

**Dated this 28<sup>th</sup> day of June 2024.**

**/s/ Troy S. Fox**

**Troy S. Fox, Esq.**  
**Fox, Imes, & Crosby, LLC**